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UNITED STATES IND EXCHANGE COMMISSION ishington, D.C. 20549

ANNUAL AUDITED REPORT **FORM X-17A-5 PART III**



OMB APPROVAL

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FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	1/1/15 MM/DD/YY	AND ENDING	12/31/15 MM/DD/YY	
A. RI	EGISTRANT IDENTII	FICATION		
NAME OF BROKER DEALER:			OFFICIAL USE ONLY	
Benedetto, Gartland & Company, Inc.			311.3.1.2 332 3.1.2.	
ADDRESS OF PRINCIPAL PLACE OF BUSINES	SS: (Do not use P.O. Box No.)	p.) FIRM ID. NO.		
444 Madison Avenue, 4th Floor				
	(No. and Street)			
New York (City)	New York (State)		10022 (Zip Code)	
NAME AND TELEPHONE NUMBER OF PERSO	ON TO CONTACT IN RE	GARD TO THIS REPO	ORT	
Paul A. Rahn			(212) 424-9714	
			(Area Code — Telephone No.)	
B. AC	COUNTANT IDENTI	FICATION	,	
INDEPENDENT PUBLIC ACCOUNTANT whose	opinion is contained in this Repo	rt*	and the second second	
Farkouh, Furman & Faccio, LLP	opinion is contained in this Repo ne — if individual, state last, first New York	Committee AND E	CHANGE COMMISSION	
(Nam	ne — if individual, state last, firs	, middle name)	Capacity Press.	
460 Park Avenue (Address)	New York (City)	<i>il</i>	State (Zip Code)	
CHECK ONE: Certified Public Accountant Public Accountant Accountant not in residence in United Sta		11 REGIST	RATIONS BRANCH	
	FOR OFFICIAL USE ONLY			
*Claims for exemption from the requirement that the a supported by a statement of facts and circumstances		ne exemption des sub lib		
	-1-	1	6 2013	
SEC 1410 (06-02)		11 REGISTRAT	TIONS BRANCH 3	

OATH OR AFFIRMATION

sta De pro	teme cem prie	A. Rahn, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial ent and supporting schedules pertaining to the firm of Benedetto, Gartland & Company, Inc., as of ber 31, 2015 are true and correct. I further swear (or affirm) that neither the company nor any partner, tor, principal officer or director has any proprietary interest in any account classified solely as that of a er, except as follows:		
	_			
	-			
	-			
		Plan 1		
	•	JUDITH A. MICELI Notary Public, State Of New York Signature		
		No.01MI4860689		
		Commission Expires May 27, 20 18 Chief Financial Officer		
		Title		
_		Notary Public		
Thi	s repo	ort** contains (check all applicable boxes):		
\boxtimes	(a)	Facing Page.		
\boxtimes		Statement of Financial Condition.		
	(c)	Statement of Income (Loss).		
	(d)	Statement of Cash Flows.		
	(e)	Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietor's Capital.		
		Statement of Changes in Subordinated Borrowings.		
		Computation of Net Capital.		
Ц		Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.		
	(i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.			
Ц	(j) A Reconciliation, including appropriate explanation, of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.			
	(k)	A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.		
\boxtimes	(l)	An Oath or Affirmation.		
	(m)	A copy of the SIPC Supplemental Report.		
	(n)	A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.		
	(o)	A reconciliation of net capital per original focus report to net capital.		

** For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).



REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Stockholder of Benedetto, Gartland & Company, Inc.:

We have audited the accompanying statement of financial condition of Benedetto, Gartland & Company, Inc. as of December 31, 2015, and the related notes to the financial statements. This financial statement is the responsibility of Benedetto, Gartland & Company, Inc.'s management. Our responsibility is to express an opinion on this financial statement based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the statement of financial condition is free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the statement of financial position. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall statement of financial position presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the statement of financial condition referred to above presents fairly, in all material respects, the financial position of Benedetto, Gartland & Company, Inc. as of December 31, 2015, in accordance with accounting principles generally accepted in the United States of America.

CERTIFIED PUBLIC ACCOUNTANTS

Fally Fun & Fai LLP

New York, New York February 24, 2016



STATEMENT OF FINANCIAL CONDITION AS AT DECEMBER 31, 2015

ASSETS

Cash and Cash Equivalents Other Receivable Prepaid Expenses. Machinery and Equipment, net of Accumulated Depreciation of \$4,251		36,825 2,607 1,809 4,480	
Total Assets	<u>\$</u>	45,721	
<u>LIABILITIES</u>			
Accounts Payable		20,177 25,048	
Total Liabilities	\$	45,225	
STOCKHOLDER'S EQUITY			
Common Stock, \$.01 par value, 200 shares authorized, 100 shares issued and outstanding		1 4,394,622 (4,394,127)	
Total Stockholder's Equity		496	
Total Liabilities and Stockholder's Equity.	\$	45,721	

NOTES TO STATEMENT OF FINANCIAL CONDITION AS AT DECEMBER 31, 2015

ORGANIZATION AND NATURE OF BUSINESS:

Benedetto, Gartland & Company, Inc. (the "Company") is registered with the Securities and Exchange Commission (the "SEC") as a "broker/dealer" pursuant to Section 15(b) of the Securities Exchange Act of 1934 and is a member of the Financial Industry Regulatory Agency. The principal business of the Company is to render investment banking services.

SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES:

METHOD OF ACCOUNTING - The accompanying financial statements have been prepared on the accrual basis of accounting. The accrual basis of accounting recognizes revenues in the accounting period in which revenues are earned regardless of when cash is received, and recognizes expenses in the accounting period in which expenses are incurred regardless of when cash is disbursed.

FEES RECEIVABLE - Fees receivable are recorded at their estimated net realizable value, net of an allowance for doubtful accounts. The Company's estimate of the allowance for doubtful accounts is based upon historical experience, its evaluation of the status of receivables, and unusual circumstances, if any. Fees considered uncollectible are charged against the allowance.

MANAGEMENT'S USE OF ESTIMATES AND ASSUMPTIONS - The preparation of the financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

INCOME TAXES - The Company is an "S" corporation for federal and state income tax purposes. Accordingly, the Company is not subject to federal and state income taxes as the net income or (loss) of the Company flows through to its shareholder. The Company is, however, subject to income taxes in New York City.

(continued)

NOTES TO STATEMENT OF FINANCIAL CONDITION AS AT DECEMBER 31, 2015

SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued):

Generally, the Company is subject to income tax examinations by major taxing authorities during the three-year period prior to the period covered by these financial statements. The Company is required to determine whether its tax positions are more likely than not to be sustained upon examination by the applicable taxing authority, based on the technical merits of the position. The tax benefit recognized is measured as the largest amount of benefit that has a greater than fifty percent likelihood of being realized upon ultimate settlement with the relevant taxing authorities. Based on its analysis, the Company has determined that it has not incurred any liability for unrecognized tax benefits as of December 31, 2015. The Company does not expect that its assessment regarding unrecognized tax benefits will materially change over the next twelve months. However, the Company's conclusions may be subject to review and adjustment at a later date based on factors including, but not limited to, questioning the timing and amount of deductions, the nexus of income among various tax jurisdictions, compliance with U.S. federal, U.S. state and foreign tax laws, and changes in the administrative practices and precedents of the relevant taxing authorities.

REVENUE RECOGNITION - Investment banking and advisory fees are recognized as revenue when earned by the Company. Gains or losses resulting from foreign currency transactions are included in net income.

CASH AND CASH EQUIVALENTS - The Company maintains all of its cash balances in checking and savings accounts at a major international bank. The Company did not maintain cash in any other investment accounts in 2015.

MACHINERY AND EQUIPMENT – Machinery and equipment are stated at their cost and are depreciated using the straight-line method over five years.

CONCENTRATION OF RISK OF CUSTOMERS:

The Company's investment banking activities are typically conducted with counterparties which may include domestic or international corporations and private investment funds. In the event these counterparts do not fulfill their obligations, the Company may be exposed to risk. The risk of default depends on the credit-worthiness of the counterparty. It is the Company's policy to review, as necessary, the credit standing of each counterparty. At December 31, 2015 and for the year then ended, the Company had no fees receivable and no investment banking fee revenue.

(continued)

NOTES TO STATEMENT OF FINANCIAL CONDITION AS AT DECEMBER 31, 2015

NET CAPITAL REQUIREMENTS:

Pursuant to the Uniform Net Capital Rule under the Securities Exchange Act of 1934 (Rule 15c3-1), the Company is required to maintain minimum net capital of the greater of \$5,000 or 6 2/3% of the Company's aggregate indebtedness as defined. At December 31, 2015, the Company had net capital of \$(8,400) which is below the minimum net capital requirement of \$5,000 by \$13,400 and the Company's ratio of aggregate indebtedness to net capital was (5.38) to 1. The deficiency in minimum net capital was alleviated on January 15, 2016, when the Company earned and received an investment banking fee of \$5,317,350.

STOCKHOLDER'S EQUITY:

During the year, the Company's sole shareholder made capital contributions to Additional Paid-In Capital of \$208,987.

SUBSEQUENT EVENTS:

The date to which events occurring after December 31, 2015, the date of the most recent statement of financial condition, have been evaluated for possible adjustment to the financial statements or disclosure is February 24, 2016 which is the date on which the financial statements were available to be issued.

BENEDETTO, GARTLAND & COMPANY, INC. REPORT ON STATEMENT OF FINANCIAL CONDITION

FOR THE YEAR ENDED DECEMBER 31, 2015

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